

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

FILED

SEP 19 2007

Phil Lombardi, Clerk
U.S. DISTRICT COURT

RON CRAWFORD and TRACY BLOSS,)

Plaintiffs,)

vs.)

CITY OF GROVE,
A Municipal Corporation,)

Defendant.)

07 CV - 529 GKF - SAJ

Case No: _____

COMPLAINT

COME NOW, Plaintiffs Ron Crawford ("Crawford") and Tracy Bloss ("Bloss"), and bring this action pursuant to the Fair Labor Standards Act ("FLSA"), 29 U.S.C. §201, et. seq. Defendant failed to compensate Plaintiffs for compensable hours worked by Plaintiffs.

I. JURISDICTION

1. This action arises pursuant to the FLSA, 29 U.S.C. § 201, et. seq.
2. Plaintiff Crawford is a citizen of the United States and a resident of Jay, Oklahoma, Delaware County.
3. Plaintiff Bloss is a citizen of the United States and a resident of Grove, Oklahoma, Delaware County.
4. At all times relevant to the compensation claimed by Plaintiffs, Plaintiffs were employees of the City of Grove Police Department.
5. Defendant, the City of Grove, Oklahoma is a municipal corporation pursuant to the laws of the State of Oklahoma.
6. Plaintiffs bring this action pursuant to 29 U.S.C. § 216(b) which grants this Court jurisdiction.

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II. FACTS GIVING RISE TO CAUSE OF ACTION

COUNT I VIOLATION OF THE FLSA: FAILURE TO COMPENSATE FOR HOURS WORKED

7. Plaintiffs adopt and re-allege each and every allegation contained in Paragraphs 1-6 as set forth herein.

8. Beginning on or about March, 2002 and to September, 2006, Plaintiff Crawford was assigned as a canine officer for the City of Grove Police Department.

9. From September, 2006, to present Plaintiff Bloss was assigned as a canine officer for the City of Grove Police Department.

10. Plaintiffs' job as a canine officer involved caring for, training and transporting the canine.

11. Defendant suffered and permitted Plaintiffs to work in excess of the overtime threshold in each seven-day work period to care for the Department's police dog.

12. Said time constitutes hours worked under the FLSA.

13. Defendant has not compensated Plaintiffs for any of the off duty hours they spent caring for the dog.

14. Defendant denied and continues to deny Plaintiffs' request to be compensated for the hours they worked caring for the canine.

15. Defendant's refusal to compensate Plaintiffs for their work caring for the canine is a willful violation of the FLSA.

WHEREFORE, Plaintiffs demands judgment against Defendant for compensation for hours worked by Plaintiffs caring for the canine, and liquidated damages, prejudgment interest, attorney fees and costs.

Respectfully submitted,



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JURY TRIAL DEMANDED
ATTORNEYS LIEN CLAIMED